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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Micron Technology, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER ) CASE NO. IPC-E-21-32  
COMPANY'S APPLICATION FOR )  
APPROVAL TO MODIFY ITS DEMAND ) PETITION TO INTERVENE  
RESPONSE PROGRAMS ) OF MICRON TECHNOLOGY, INC.

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules of Procedure Rules 71 through 74,<sup>1</sup> hereby petitions the Commission for leave to intervene and to appear and participate in this proceeding as a party, and as grounds therefore states:

1. The name and address of this Intervenor is:

Micron Technology, Inc.  
c/o Austin Rueschhoff  
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<sup>1</sup> Idaho Admin. Code 31.01.01.071- .074.

Copies of all pleadings, production requests, production responses, Commission orders, and other documents should be provided to:

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2. Micron receives electric utility services from Idaho Power Company (“Idaho Power”) as a Special Contract customer. Micron is Idaho Power’s single largest customer. Micron is also an active participant in Idaho Power’s Flex Peak demand response program for commercial and industrial customers. In this proceeding, Idaho Power seeks approval to modify its demand response programs, including the Flex Peak program. Idaho Power also seeks to modify how it evaluates the cost-effectiveness of its demand response programs. These potential changes will have a direct impact on Micron’s participation in the Flex Peak program and the retail rates it pays for electric service. Therefore, Micron has a direct and substantial interest in this proceeding.

3. Micron intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence Micron will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Granting Micron’s Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

5. Without the opportunity to intervene, Micron would be without adequate means of participation in this proceeding that may have a material impact on its electric service rates.

**WHEREFORE**, Micron Technology, Inc. respectfully requests that the Commission grant its Petition to Intervene in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in this proceeding.

Respectfully submitted November 10, 2021.

HOLLAND & HART, LLP

By: 

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Attorneys for Micron Technology, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-21-32 was served in the manner shown to:

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*s/ Gina Gargano-Amari*  
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